



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS:ANR
F. #2021R00667

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 20, 2022

By E-mail

The HONORABLE RAMON E. REYES, JR.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Quanzhong An, et al.
Criminal Docket No. 22 CR 460 (KAM) (RML)

Dear Judge Reyes:

The government respectfully moves for an order (1) unsealing the indictment and arrest warrants in the above-captioned matter; and (2) de-designating the indictment and arrest warrants in the above referenced case as Highly Sensitive Documents ("HSD"). In order to mitigate privacy concerns implicating the defendants and uncharged third parties, the government encloses a proposed partially redacted indictment to be filed on the public docket. Notably, the government is seeking the full unsealing of the indictment for dissemination to defense counsel.

Please note that the government is not currently moving to de-designate as HSD or unseal the application and accompanying Order to designate the above captioned materials as HSD filed under docket number 22 MC 3000 on October 7, 2022.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Alexander A. Solomon
Antoinette N. Rangel
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Enclosure

cc: Clerk of Court (by ECF)